MISSOURI
DEPARTMENT OF
NATURAL RESOURCES
Air Pollution Control Program

PART 70
PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2018-058
Expiration Date:
Installation ID: 091-0011
Project Number: 2014-09-053

Installation Name and Address
DRS Sustainment Systems Inc. West Plains
PO Box 196
West Plains, MO 65775
Howell County

Parent Company's Name and Address
DRS-SSI
201 Evans Lake
St. Louis, MO 65775

Installation Description:
DRS Sustainment Systems Inc is a manufacturing facility located in West Plains, MO with the principal product being truck trailers for the military. The processes include shot blasting, welding, painting, drying, and engine testing. The facility occupies approximately 100 acres and operates twelve paint booths as part of the manufacturing process. All painting and priming operations, except for minor touch-up operations, are performed in enclosed areas where filters are utilized to control particulate emissions. The facility is a major source for VOCs, HAPs, and NOx.

Prepared by
Bern Johnson
Operating Permit Unit

Director or Designee
Department of Natural Resources

Effective Date

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I. Installation Description and Equipment Listing

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations.

Emission Point #	Description
EP01	Shot Blast Bag Tower P1 (Steel)
EP04	Homemade Paint Booth
EP07	Binks Paint Booth
EP08	Binks Paint Booth
EP09	Binks Paint Booth
EP10	Binks Paint Booth
EP12	Binks Paint Booth
EP20	Binks Paint Booth
EP41	Burnoff Oven, 0.5 MMBTU/hr
EP43	Topcoat Booth
EP45	Wash Primer Booth
EP46	Primer Booth
EP50	Tunner Engine Test, 2.7 MMBTU/hr
EP51	Abrasive Blasting, Plant 10
	emergency generator, natural gas, 60hp/45kW, June 2007

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Emission Point #	Description
EP13	Oven, Natural Gas, 1.99 MMBTU/hr
EP26	Power Washers (8), Natural Gas, 3.19 MMBTU/hr
EP27	Space Heaters, Natural Gas, 5.12 MMBTU/hr
EP29	Aboveground Fuel Storage – Diesel
EP33	Aboveground Fuel Storage – Gasoline
EP35	Gas Metal Arc Welding (GMAW & GTAW)
EP39	Hasting Makeup Air Unit – 10.7 MMBTU/hr
EP42	Cleaning Tanks, Spray Equipment, 3.548 MMBTU/hr total
EP44	Primer Cure Infrared Oven, 1.2 MMBTU/hr
EP47	Infrared Oven, 0.96 MMBTU/hr
EP48	Convection Oven, 3.011 MMBTU/hr

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. The plant wide conditions apply to all emission units at this installation. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

The following general conditions apply to all plantwide and emission unit specific conditions in this document, unless otherwise stated.

Monitoring:
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer's recommendations, or maintenance and operational history of similar units. All calibrations, maintenance, and operations shall occur according to good engineering practices. All manufacturing specifications and operational/maintenance histories shall be kept on site.

Recordkeeping:
1) The permittee shall record all required record keeping in an appropriate format.
2) Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations (see Attachment E).
3) The permittee shall keep a copy of this operating permit, copies of all issued construction permits, and copies of all Safety Data Sheets (SDS) on site.
4) All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:
1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after end of the month during which the exceedance or event causing the exceedance occurs (unless otherwise specified in the specific condition).
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of any permit condition in the semi-annual monitoring report and annual compliance certification.
3) All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov

PERMIT CONDITION PW 1
10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(6)(C)1. Voluntary Limitation(s)
10 CSR 10-6.060 Construction Permits Required Construction Permit 042009-007

Emission Limitation:
The permittee shall emit less than 250.00 tons of VOCs from the entire installation in any rolling 12-month period. [Special Condition 1.a]

PERMIT CONDITION PW 2
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:
The permittee shall not cause or permit to be discharged into the atmosphere from the facility any visible emissions in excess of 20 percent. Since all emission units are contained inside the main building, only one observation is required for the entire facility.

Monitoring:
1) The permittee shall conduct visible emissions observations for the entire facility using the procedures contained in USEPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. If visible emissions are observed, the source representative would then conduct a Method 9 observation.
2) The permittee must maintain the following monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
   b) Should the permittee observe no violations of this regulation during this period then-
      i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
      ii) If a violation is noted, monitoring reverts to weekly.
      iii) Should no violation of this regulation be observed during this period then-
         (1) The permittee may observe once per month.
         (2) If a violation is noted, monitoring reverts to weekly.
3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
4) The renewal of an operating permit does not require the installation to revert to weekly monitoring; instead, it should continue with the monitoring regime it is under at the time of issuance of the renewal permit.

Recordkeeping:
The permittee shall maintain records of all observation results using Attachment A (or its equivalent), noting:
1) Whether any air emissions (except for water vapor) were visible from the emission units;
2) All emission units from which visible emissions occurred;
3) Whether the visible emissions were normal for the process;
4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

PERMIT CONDITION 1 10 CSR 10-6.060 Construction Permits Required Construction Permit 0197-027 Issued December 23, 1996		
Emission Unit	Description	Manufacturer/Model #
EP41	Pyrolysis Cleaning Furnace	Pollution Control Products/PRC1894174

Emission Limitation:

1) The permittee shall not operate the pyrolysis cleaning furnace if the afterburner temperature is below 1500 degrees Fahrenheit and in excess of 1800 degrees Fahrenheit. [Special Condition 1]
2) The permittee is prohibited from burning TeflonTM, chlorinated plastics, chlorinated solvents, refuse, garbage or trash in the pyrolysis cleaning furnace. [Special Condition 4]

PERMIT CONDITION 2 10 CSR 10-6.060 Construction Permits Required Construction Permit 012011-005 Issued January 5, 2011		
Emission Unit	Description	Manufacturer/Model #
EP50	Tunner Engine Test, 2.7 MMBTU/hr	Kubota EB300

Emission Limitation:

The permittee shall emit less than 40.0 tons of nitrogen oxides (NO_x) combined in any rolling 12-month period from EP-50. [Special Condition 1.A]

PERMIT CONDITION 3 10 CSR 10-6.060 Construction Permits Required Construction Permit 062016-003 Issued February 5, 2016		
Emission Unit	Description	Manufacturer/Model #
EP51	Abrasive Blasting, Plant 10	custom

Operational Limitation:

1) The permittee shall use abrasive blasting enclosures to capture emissions from the abrasive blasting activities. Emissions from the blasting enclosures shall be routed through the dust collector. [Special Condition 2.A.]
2) The permittee shall control emissions from the abrasive blasting process (EP-51) using a dust collector. [Special Condition 1.A.]
3) The dust collector shall be operated and maintained in accordance with the manufacturer's specifications. The dust collector shall be equipped with a gauge or meter, which indicates the

pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. [Special Condition 1.B.]

4) Replacement cartridges for the dust collector shall be kept on hand at all times. The cartridges shall be made of materials appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 1.C.]
5) The permittee shall verify the proper operation of each abrasive blasting enclosure by checking the face velocity of the enclosure every 24 hours of operation. [Special Condition 2.D.]
6) When considering blasting alternative parts that are coated with a material that contains particulate HAPs in the abrasive blasting process (EP-51) that are different than the materials listed in the Application for Authority to Construct, the permittee shall calculate the potential emissions of all individual particulate HAPs in the alternative material. [Special Condition 3.A.]
7) The permittee shall seek approval from the Air Pollution Control Program before blasting the alternative material if the potential individual particulate HAP emissions of blasting the alternative material are equal to or greater than the screening model action level for any chemical (https://dnr.mo.gov/env/apcp/permits/docs/HAPs_Table_Rev_14updated.pdf) [Special Condition 3.B.]

Monitoring/Recordkeeping:

1) The permittee shall monitor and record the operating pressure drop across the dust collector at least once every 24 hours when in operation (see Attachment F). The operating pressure drop shall be maintained within the design conditions specified by the filter manufacturer's performance warranty. [Special Condition 1.D.]
2) The permittee shall maintain a copy of the dust collector manufacturer's performance warranty on site. [Special Condition 1.E.]
3) The permittee shall maintain an operating and maintenance log (Attachment D or equivalent) for the dust collector which shall include the following: [Special Condition 1.F.]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
4) The permittee shall demonstrate that each abrasive blasting enclosure was constructed according to Occupational Safety and Health Administration (OSHA) requirements, 29 CFR 1910.94(a)(3) *Blast-cleaning enclosures*, by keeping a record of the following design parameters: [Special Condition 2.C.]
   a) the minimum recommended face velocity
   b) engineering drawings which demonstrate that the enclosure was designed to meet the minimum face velocity

PERMIT CONDITION 4 10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(6)(C)1. Voluntary Limitation(s)	
Emission Unit	Description
EP01	Shot Blast Bag Tower P1 (Steel)
EP04	Homemade Paint Booth
EP07	Binks Paint Booth
EP08	Binks Paint Booth
EP09	Binks Paint Booth
EP10	Binks Paint Booth
EP12	Binks Paint Booth
EP20	Binks Paint Booth
EP43	Topcoat Booth
EP45	Wash Primer Booth
EP46	Primer Booth

Operating Limitation:

1) The permittee shall operate fabric filters at all times when these unit are in operation. The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications and achieve at least 95% control efficiency. The filters shall be made of appropriate material for operating conditions expected to occur (e.g. temperature limits, acidic and alkali resistance, abrasion resistance, etc.).
2) The permittee shall equip the fabric filter(s) with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them.
3) The permittee shall keep replacement filters on hand at all times.

Monitoring/Recordkeeping:

1) The permittee shall monitor and record the pressure drop across the dust collector at least once every 24 hours. The pressure drop shall be maintained within the normal operating range indicated by the manufacturer's specifications.
2) The permittee shall maintain an operating and maintenance log for the collector which shall include the following:
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair action, and replacements, etc. (see Attachment D)

PERMIT CONDITION 5 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	
Emission Unit	Description
none	emergency generator, natural gas, 60hp/45kW, June 2007

Emission Standards:

The permittee shall comply with the following emission standards for new nonroad CI engines (from Table 1 to Subpart I) in g/KW-hr (g/HP-hr): [§60.4205(a)]

a) NOx – 9.2 (6.9)

Operational Standards:

1) The permittee shall operate and maintain these units so that they achieve the emission standards in ***Emission Standards:*** over the entire life of the engine. [§60.4206]
2) Each unit shall have a functional non-resettable hour meter. [§60.4209(a)]
3) The permittee shall operate and maintain these units according to the manufacturer's emission-related written instructions. [§60.4211(a)]

Compliance Requirements:

1) The permittee shall operate the emergency stationary ICE according to the requirements in a) through c) below. In order for the engine to be considered an emergency stationary ICE under Subpart IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year is prohibited. If the permittee does not operate the engine according to these requirements, the engine will not be considered an emergency engine and shall meet all requirements for non-emergency engines. [§60.4211(f)]
   a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
   b) The permittee may operate the emergency stationary ICE for a maximum of 100 hours per calendar year for the following purpose: [§60.4211(f)(2)]
      i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]
   c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in nonemergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing in 1)b)i) above. Except as provided in in i) below, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]

i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§60.4211(f)(3)(i)]
   (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4211(f)(3)(i)(A)]
   (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§60.4211(f)(3)(i)(B)]
   (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4211(f)(3)(i)(C)]
   (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4211(f)(3)(i)(D)]
   (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§60.4211(f)(3)(i)(E)]

2) If the permittee does not operate and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [§60.4211(g)]
3) If you are an owner or operator of a stationary CI internal combustion engine with maximum engine power less than 100 HP, you must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if you do not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or you change the emission-related settings in a way that is not permitted by the manufacturer, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of such action.[§60.4211(g)(1)]

Recordkeeping Requirements;

The permittee shall keep records of the hours of operation of the engine that are recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation (see Attachment G or equivalent).

PERMIT CONDITION 6 40 CFR Part 63 Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	
Emission Unit	Description
EP04	Homemade Paint Booth
EP07	Binks Paint Booth
EP08	Binks Paint Booth
EP09	Binks Paint Booth
EP10	Binks Paint Booth
EP12	Binks Paint Booth
EP20	Binks Paint Booth
EP43	Topcoat Booth
EP45	Wash Primer Booth
EP46	Primer Booth

Emission Limitation:

1) The permittee shall limit organic HAP emissions to the atmosphere from the affected source to no more than 2.6 pounds organic HAP per gallon of coating solids used during each rolling 12-month compliance period. [63.3890(b)(1)]
2) The affected source applies to the surface coating of any miscellaneous metal parts or products. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. These activities do not comprise surface coating if they are not directly related to the application of the coating.
3) All coatings, thinners and/or other additives, and cleaning materials used in the affected source must be included when determining whether the organic HAP emissions rate is equal to or less than the applicable emission limit.
4) The permittee must use at least one of the three compliance options listed in 40 CFR 63.3891. Currently, the permittee is using the "emission rate without add-on controls" compliance option. If the permittee switches between compliance options for any coating operation or group of coating operations, they must document this switch and report it in the next semiannual compliance report required in ***Reporting:*** 5)d).

Monitoring:

When using the "emission rate without add-on controls" compliance option, the permittee shall monitor the following.

a) Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month
   i) The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the following procedures when performing a Method 311 test.

(1) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.,* 0.3791).

(2) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.,* 0.763).

ii) For coatings,the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, it may use the alternative method contained in appendix A to subpart PPPP, rather than Method 24. It may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP, as a substitute for the mass fraction of organic HAP.

iii) The permittee may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

iv) The permittee may rely on information other than that generated by the test methods specified in paragraphs i) through iii), such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, it may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs i) through iii) of this section, then the test method results will take precedence unless, after consultation, it may demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

v) The permittee may use solvent blends listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, it may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 of Subpart MMMM. If it uses the tables, It must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and it may use Table 4 only if the solvent blends in the materials it uses does not match any of the solvent blends in Table 3 and it knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

b) The permittee shall determine the volume fraction of coating solids per gallon of coating for each coating used during each month:

i) The permittee must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by the following calculations. If test results do not agree with the information obtained under (3) or (4), the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(1) *ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).* You may use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see §63.14), or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Alternative method.* It may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. It must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(3) *Information from the supplier or manufacturer of the material.* It may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(4) *Calculation of volume fraction of coating solids.* It may determine the volume fraction of coating solids using Equation 1 of this section:

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$$

Where:

V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{volatiles}$ = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24, grams volatile matter per liter coating.

D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

c) Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results, information from the supplier or manufacturer of the material, or reference sources providing density and specific gravity data for pure materials. If the permittee is using powder coatings in the compliance determination, determine the density of powder coatings using ASTM Method D5965-02, or information from the supplier. If the permittee purchases materials or monitors consumption by weight instead of volume, they do not need to determine material density.

d) Determine the volume of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, they do not need to determine the volume of each material used.

e) Calculate the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions (Equation 1 of 40 CFR 63.3951(f)):

He = A + B + C – Rw
Where:
H_e = Total mass of organic HAP emissions during the month, kg.
A = Total mass of organic HAP in the coatings used during the month, kg, as calculated:

$$A = \sum_{i=1}^{m}(Vol_{c,i})\,(D_{c.i})(W_{c,i})$$

Where:
A = Total mass of organic HAP in the coatings used during the month, kg.
$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.
$D_{c,i}$ = Density of coating, i, kg coating per liter coating.
$W_{c,i}$ = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives, use the mass fraction of organic HAP that is emitted.
m = Number of different coatings used during the month.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated:

$$B = \sum_{j=1}^{n}(Vol_{t,j})\,(D_{t,j})(W_{t,j})$$

Where:
B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.
$Vol_{t,j}$ = Total volume of thinner and/or other additive, j, used during the month, liters.
$D_{t,j}$ = Density of thinner and/or other additive, j, kg per liter.
$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives, use the mass fraction of organic HAP that is emitted.
n = Number of different thinners and/or other additives used during the month.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated:

$$C = \sum_{k=1}^{p}(Vol_{s,k})(D_{s,k})\,(W_{s,k})$$

Where:
C = Total mass of organic HAP in the cleaning materials used during the month, kg.
$Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.
$D_{s,k}$ = Density of cleaning material, k, kg per liter.
$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.
p = Number of different cleaning materials used during the month.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg (You may assign a value of zero to R_w if you do not wish to use this allowance.).

f) Calculate the total volume of coating solids (Equation 2 of 40 CFR 63.3951(f)).

$$V_{st} = \sum_{i-1}^{m} (Vol_{c,i})(V_{s,i})$$

Where:
V_{st} = Total volume of coating solids used during the month, liters.
$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.
$V_{s,i}$ = Volume fraction of coating solids for coating, i, liter solids per liter coating.
m = Number of coatings used during the month.

g) Calculate the organic HAP emission rate for the compliance period (Equation 3 of 40 CFR 63.3951(g)):

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}}$$

Where:
H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.
H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1.
V_{st} = Total volume of coating solids used during month, y, liters, as calculated by Equation 2.
y = Identifier for months.
n = Number of full or partial months in the compliance period (n equals 12).

h) The permittee must perform the calculations listed above on a monthly basis using data from the previous 12 months of operation.

Record Keeping:

1) A copy must be kept of each notification and report that the permittee submitted to comply with this subpart, and the documentation supporting each notification and report.
2) A current copy of information provided by materials suppliers or manufacturers must be kept, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating thinner and/or other addition, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine the mass fraction or organic HAP, density, or volume fraction of coating solids, a copy must be kept of the complete test report. If the permittee uses information provided by the manufacturer or supplier of the material that was based on testing, a summary sheet of the provided by the manufacturer or supplier must be kept.
3) For each compliance period the following records must be kept:
   a) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option used.

b) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and the cleaning materials used for each month using equations in ***Monitoring:*** e), f), and g).
c) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
d) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
e) A record of the volume fraction of coating solids for each coating used during each compliance period.
f) The density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.
g) If the permittee uses an allowance in ***Monitoring:*** e) (Equation 1) for organic HAP contained in waste materials sent or designated for shipment to a treatment, storage, and disposal facility (TSDF), they must keep records listed below.
   i) The name and address of each TSDF to which the permittee sent waste materials for which they use an allowance.
   ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials.
   iii) The methodology used to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring and supporting calculations and documentation, including the waste manifest for each shipment.

4) The permittee must keep records of the date, time, and duration of each deviation.

Reporting:

1) The permittee must submit semiannual compliance reports for each affected source to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2) The information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
3) Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.
4) Each semiannual compliance report must be postmarked or delivered no later than October 1 or April 1, whichever date is the first date following the end of the semiannual reporting period.
5) The semiannual compliance report must contain the information specified below:.
   a) Company name and address.
   b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
   c) Date of report and beginning and ending dates of the reporting period.
   d) Identification of the compliance option that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, they must report the beginning and ending dates for each option they used.
   e) If the permittee used the emission rate without add-on controls compliance option, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

f) If there no deviations from the emission limitations in ***Emission Limitation:*** 1), the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period.
g) If the permittee used the emission rate without add-on controls option and there was a deviation from ***Emission Limitation:*** 1), the semiannual compliance report must contain the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit, the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, and a statement of the cause of each deviation.

PERMIT CONDITION 7 10 CSR 10-6.260 Restriction of Emissions of Sulfur Compounds		
Emission Unit	Description	Manufacturer/Model #
EP50	Tunner Engine Test, 2.7 MMBTU/hr	Kubota EB300
none	emergency generator, natural gas, 60hp/45kW, June 2007	

Note: As of issuance of this permit, 10 CSR 10-6.260 is a Federal Only requirement. This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it remains in Missouri's SIP and thus still remains an applicable federal regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 10-6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.

Emission Limitation:
Emissions from this source operation shall not contain more than 500 parts per million by volume (ppmv) of sulfur dioxide or more that 35 milligrams per cubic meter (mg/m3) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

Monitoring/Recordkeeping:
Compliance with Permit Condition 5 ensures compliance with the condition.

Reporting:
1) The permittee shall report any exceedance of any of the terms imposed by this permit condition, or any malfunction which could cause an exceedance of any of the terms imposed by this permit condition, no later than ten days after the exceedance or event causing the exceedance. The permittee shall submit these reports to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219.
2) The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report (SAM) and annual compliance certification (ACC). The permittee shall submit the SAM and ACC reports to both the EPA Region VII and Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

PERMIT CONDITION 8 10 CSR 10-6.261 Control of Sulfur Dioxide Emissions		
Emission Unit	Description	Manufacturer/Model #
EP50	Tunner Engine Test, 2.7 MMBTU/hr	Kubota EB300
none	emergency generator, natural gas, 60hp/45kW, June 2007	

Note: As of issuance of this permit, 10 CSR 10-6.261 is a State Only requirement. Missouri's SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action is required on the part of the permittee upon the adoption of 10 CSR 10-6.261 into the Missouri SIP.

Operational Limitation

Fuel shall not contain more than 8,812 parts per million (ppm) of sulfur for distillate fuel. [10 CSR 10- 6.261(3)(C)]

Monitoring/ Recordkeeping

1) The permittee shall determine compliance using fuel delivery records. [10 CSR 10-6.261(3)(E)3.]
2) The permittee must maintain a record of fuel deliveries. [10 CSR 10-6.261(4)(A)3.]
3) The permittee must maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule: [10 CSR 10-6.261(4)(C)]
   a) The name, address, and contact information of the fuel supplier; [10 CSR 10-6.261(4)(C)1.]
   b) The type of fuel; [10 CSR 10-6.261(4)(C)2.]
4) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and [10 CSR 10-6.261(4)(C)4.]
5) The heating value of the fuel. [10 CSR 10-6.261(4)(C)5.]
6) The permittee shall maintain records for a minimum of five (5) years on-site. [10 CSR 10- 6.261(4)(F)]
7) The permittee shall make all records available within five (5) business days upon written or electronic to Missouri Department of Natural Resources' personnel upon request. [10 CSR 10- 6.261(4)(F)]
8) The permittee shall furnish the Missouri Department of Natural Resources all data necessary to determine compliance status. [10 CSR 10-6.261(4)(G)]

Reporting

1) The permittee shall report any excess emissions other than startup, shutdown, and malfunction excess emissions already required to be reported under 10 CSR 10-6.050 to the director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following: [10 CSR 10-6.261(4)(A)1.]
   a) Name and location of source;
   b) Name and telephone number of person responsible for the source;
   c) Identity and description of the equipment involved;
   d) Time and duration of the period of SO_2 excess emissions;
   e) Type of activity;

f) Estimate of the magnitude of the SO_2 excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
g) Measures taken to mitigate the extent and duration of the SO_2 excess emissions; and
h) Measures taken to remedy the situation which caused the SO_2 excess emissions and the measures taken or planned to prevent the recurrence of these situations

2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction that could possibly cause an exceedance of this regulation.
3) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.170
Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
   a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
   b) Paving or frequent cleaning of roads, driveways and parking lots;
   c) Application of dust-free surfaces;
   d) Application of water; and
   e) Planting and maintenance of vegetative ground cover.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
2) Should no violation of this regulation be observed during this period then-
   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-

i) The permittee may observe once per month.
ii) If a violation is noted, monitoring reverts to weekly.

3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to an exceedance.
3) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

This is a State Only permit requirement.

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

10 CSR 10-6.280 Compliance Monitoring Usage

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:

a) Monitoring methods outlined in 40 CFR Part 64;
b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
      ii) 10 CSR 10-6.040, "Reference Methods";
      iii) 10 CSR 10-6.070, "New Source Performance Standards";
      iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued,

10 CSR 10-6.065(6)(C)1.B Permit Duration
10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
      ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(6)(C)1.F Severability Clause

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

10 CSR 10-6.065(6)(C)1.G General Requirements

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065(6)(C)3 Compliance Requirements

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065(6)(C)6 Permit Shield

1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

a) The applicable requirements are included and specifically identified in this permit, or
b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
   a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
   b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
   c) The applicable requirements of the acid rain program,
   d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
   e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

10 CSR 10-6.065(6)(C)7 Emergency Provisions

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(6)(C)8 Operational Flexibility

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
   b) The permit shield shall not apply to these changes.

10 CSR 10-6.065(6)(C)9 Off-Permit Changes

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
   b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
   d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Eddie Kimes, Vice President of Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All

representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause

This permit shall be reopened for cause if:

1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment A
Fugitive Emission Observations

Date	Time	Visible Emissions Beyond Boundary		If There Are Visible Emissions Beyond the Property Boundary		Initial
		No	Yes	Cause	Corrective Action	

Attachment B
Visible Emission Observations

Date	Time	Emission Source	Visible Emissions		Excess Emissions		
			No	Yes[1]	Cause	Corrective Action	Initial

[1]If there are visible emissions, the permittee shall complete the excess emissions columns.

Attachment C

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____ _____ _____

YES NO Signature of Observer

Attachment D

Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # _____

Date/Time	Inspection/ Maintenance Activities	Malfunction Activities					
		Malfunction	Impact	Duration	Cause	Action	Initials

ATTACHMENT E
Custom Tracking Worksheets

Plantwide PW 2 emission limit:

- Permit Condition PW 1 of this operating permit limits the emissions of volatile organic compounds (VOC's) emitted by this installation to less than 250 tons of VOCs in any rolling 12-month period. When calculating the total emissions, be sure to include emissions from all emissions sources at this installation, listed on pages 3 and 4 of this operating permit as EP-01 through EP-51. Emissions may be grouped by type; for example, all natural gas combustion sources may be grouped and tracked together by fuel usage.
- Record at a minimum the following information:
  - The fuel consumption in MMSCF for all combustion sources; use the emission factor from AP-42 of 5.5 lbs/MMSCF.
  - For all paint booths, use Safety Data Sheet information to derive the percentage of VOCs in the coatings. Calculate monthly VOC emissions by multiplying the percentage of VOCs in the coatings by the monthly coating usage, then subtracting any VOC recovered.
- Calculate monthly VOC emissions by multiplying throughput and emission factor for each type.
- Calculate rolling 12-month VOC emissions by adding current month's emissions to previous eleven months emissions.
- Compare emission total to limit and indicate whether or not compliance was met.
- Include startup, shutdown and malfunction (SSM) emissions, if any, from the same 12 month period as reported to the Air Pollution Control Program, in accordance with IOCSR 10- 6.050 *Startup, Shutdown and Malfunction Conditions.*

Permit Condition 2 emission limits:

- Per Special Condition 1.A of construction permit 062016-003, incorporated in this operating permit as Permit Condition 2, track and record the emissions of nitrogen oxides (NOx) from Tunner Engine Test (EP-50) to ensure that the emissions of NOx will not exceed 40 tons in any rolling 12-month period.
- Record the monthly fuel usage by EP-50, using an emission factor of 604 lbs NOx/1000 gal fuel (WebFIRE SCC 20400402).
- Calculate monthly NOx emissions by multiplying the amount of fuel used by the emission factor.
- Calculate rolling 12-month emissions of NOx by adding current month's emissions to previous eleven months emissions.

Attachment F
Pressure Drop Log

Control Device ID	Week Beginning (Month/Day/Year)	Week Ending (Month/Day/Year)	Pressure Drop (inches water)	Within specifications? (Yes/No)

ATTACHMENT G

Permit Condition 5 Generator Hours of Operation

This sheet covers the period from _____ to _____.
(month/year) (month/year)

Total Unit Non-Emergency Hours for this Month (Note 1)	
Total Unit Non-Emergency Hours From Previous 11 Months' Worksheets (Note 2)	
Current 12-Month Rolling Total Unit Non-Emergency Hours (Note 3)	

Note 1:Total number of non-emergecny hours that this engine was running for this month (unit hours).
Note 2: Total of non-emergency hours from previous 11 months' worksheets.
Note 3: Sum of hours reported in Notes 1 and 2.

STATEMENT OF BASIS

INSTALLATION DESCRIPTION

DRS Sustainment Systems Inc is a manufacturing facility located in West Plains with the principal product being truck trailers for the military. The facility was previously known as Southwest Mobile Systems, ESCO Electronics Corporation, DRS Technology – Sustainment System, and DRS Sustainment Systems. The processes involved include shot blasting, welding, painting, drying, and engine testing. The facility occupies approximately 100 acres and operates twelve paint booths as part of the manufacturing process. All painting and priming operations, except for minor touch-up operations, are performed in enclosed areas where filters are utilized to control particulate emissions.

The facility is a major source for VOCs, HAPs, and NOx. They have two emissions limits from previous construction permits. The facility is not a named source and fugitive emissions are not counted for potential-to-emit calculations.

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr)[1]	HAP	Potential to Emit (tons/yr)[1]
CO	48.75	Manganese	3.42
NO_x	140.37	1,6-Diisocyanatohexane	0.95
PM_{10}	31.39	Antimonycompounds	0.01
$PM_{2.5}$	29.69	Chromiumcompounds	17.49
SO_x	7.04	Ethylbenzene	0.22
VOC	674.58	GlycolEthers	0.55
		Isomersofxylene	6.67
		Leadcompounds	0.88
		Methylalcohol	0.03
		Methylisobutylketone	10.54
		Nickelcompounds	0.01
		Toluene	3.45
		Total HAPs 44.47	44.47

[1]Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
CO	1.34	1.27	1.86	1.37	0.71
NO_x	3.35	3.22	4.92	3.64	3.34
PM_{10}	0.31	0.29	0.34	0.28	0.42
$PM_{2.5}$	0.31	0.28	0.33	0.27	0.41
SO_x	0.14	0.13	0.18	0.18	0.20
VOC	13.69	9.13	12.01	19.90	28.09
HAPs	0.83	0.57	1.16	1.13	2.17

Permit Reference Documents
These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1) Part 70 Operating Permit Application, received September 29, 2014;
2) 2016 Emissions Inventory Questionnaire, received March 31, 2016;
3) Construction Permit No. 0787-006;
4) Construction Permit No. 1088-013A;
5) Construction Permit No. 0990-005;
6) Construction Permit No. 0395-014;
7) Construction Permit No. 0896-001;
8) Construction Permit 0197-027, Issued December 23, 1996
9) Construction Permit No. 1198-016;
10) Construction Permit 012011-005, Issued January 5, 2011
11) Construction Permit 062016-003, Issued February 5, 2016
12) WebFIRE; and
13) U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* – the paint booths at this facility are exempt under (B)(14) (see Permit Condition 4). The shot blast unit, EP01, is exempt under (B)(15).

EP-35 arc welding is below 60,000 lbs/hr and is calculated with the following equation:
Maximum Allowable PM Emissions $E = 4.10P^{0.67}$
P = Process weight rate (tons/hr i.e. MHDR)
E = Allowable emission rate limit (lb/hr)

Table 1 – Determination of 10 CSR 10-6.400 PM limit

Emission Unit	MHDR (tons per hour)	Allowable Emission Rate (lbs/hr)	Emission Factor (lbs/ton)	Pre-Control PTE (lbs/hr)
EP35	0.067	3.14	10.4	0.70

These calculations demonstrate that this unit is always in compliance with 10 CSR 10-6.400.

Construction Permit History

The following is a brief history of construction permits for this installation:
CP0787-006 was issued for the construction of an incinerator. However, the incinerator was never installed and therefore the conditions from this permit have not been included in the operating permit.

CP 1088-013A was issued for the construction of three paint spray booths, and included a 40 tpy VOC limit. Two of the three booths have since been removed from operation. This limit was applied to the remaining booth in the previous operating permit. However, PW1 for Subpart MMMM is more restrictive for all paint booths, so the limit has not been included in this permit.

CP 0990-005 was issued for the construction of five dry paint booths, four steam boilers, and two drying ovens. One of the paint booths was never constructed. The four steam boilers were determined to be exempt from regulation (insignificant sources) because they are indirect heating sources with a heat input of less than 1.0 MMBTU/hr. There were no special conditions included in this permit.

CP 0395-014 was issued for the conversion of a spray wash booth to a closed abrasive blast booth. This abrasive blast booth has since been removed from service and therefore the conditions from this permit have not been included in the operating permit.

CP 0896-001 was issued for the construction of a dust removal system to a plasma arc cutting operation. The plasma arc cutting operation has since been removed from service and therefore the conditions from this permit have not been included in the operating permit.

CP 1198-016 was issued for the construction of one cleaning tank, three paint booths, two infrared ovens and one convection oven. There were no special conditions included in this permit.

CP 042009-007 was issued for a diesel engine testing process (EP-49). The engine is no longer operational.

CP 012011-005, Issued January 5, 2011 for the testing of diesel engines, hydraulic power units, and pumps associated with aircraft loading equipment. Its special conditions are in Permit Condtion 2.

CP 062016-003, Issued February 5, 2016 for the construction of two abrasive blasting booths. Its special conditions are in Permit Condition 3.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subparts K, Ka and Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)* – EP-29 and -33 represent eleven above ground storage tanks each with a storage capacity of between 500 and 3400 gallons storing gasoline or diesel fuel. The tanks are not subject to any NSPS subpart due to the small size of the tanks. Both Subparts K and Ka apply to tanks greater than 40,000 gallons. Subpart Kb applies to tanks greater than 40 cubic meters (m^3) which is approximately equal to 10,561 gallons.

40 CFR Part 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* – this regulation applies to the emergency generator, but not to engine testing or mobile units.

Maximum Achievable Control Technology (MACT) Applicability
40 CFR Part 63 Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products – this rule applies because the installation is a major source for HAPs and performs spray painting of various metal products.

40 CFR Part 63 Subpart ZZZZ *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* – does apply, but compliance is achieved through Subpart IIII in Permit Condition 5.

40 CFR Part 63 Subpart PPPPP *National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands* – does not apply based on the description described in the application, as the engines do not meet the definition of uninstalled, as they are not an integral part of the final production.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
None.

Compliance Assurance Monitoring (CAM) Applicability
40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*
The CAM rule applies to each pollutant specific emission unit that:
∞ Is subject to an emission limitation or standard, and
∞ Uses a control device to achieve compliance, and
∞ Has pre-control emissions that exceed or are equivalent to the major source threshold.
40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

Other Regulatory Determinations
None

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:
1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;

3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

A draft of the Part 70 Operating Permit for DRS Sustainment Systems Inc. was placed on public notice on May 4, 2018, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Mark A. Smith of Region VII of the Environmental Protection Agency. The eight comments are addressed in the order in which they appear within the letter.

Comment # 1
First, The Maximum Achievable Control Technology (MACT) Applicability section in the Statement of Basis is used by MoDNR to provide their rationale for either including applicable MACT standards or not including potentially applicable MACT standards. The Statement of Basis, in this draft Part 70 operating permit, includes a brief discussion on why MACT ZZZZ is applicable and a brief discussion why MACT PPPPP is not applicable. However, there is no discussion regarding MACT MMMM, which is used as the origin for Permit Condition PW1. EPA recommends MoDNR consider including discussions of all MACT applicability in the Statement of Basis.

Response to Comment:
A brief explanation of the applicability of Subpart MMMM was added to the Statement of Basis.

Comment # 2
Second, Permit Condition PW1 incorporates the applicable requirements from 40 CFR Part 63, Subpart *MMMM-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.* Permit Condition PW1 limits the discharge of organic hazardous air pollutant (HAP) emissions to the atmosphere from the *affected source* (emphasis added) to no more than 2.6 pounds of organic HAP per gallon of coating solids used during each rolling 12-month period. However, Permit Condition PW1 does not identify the *affected source* (emphasis added) which could make the emission limitation practically unenforceable. EPA strongly recommends MoDNR consider identifying all of DRS' emission units that comprise the *affected source* (emphasis added) as defined in §63.3882. Also, it is MoDNR customary practice to include examples of compliance verification records as attachments in Part 70 Operating Permits to be made available for public review and comments. However, there are no examples of the data collection records included with Permit Condition PW1. EPA encourages MoDNR to follow their customary practice and make compliance verification documents available for review and comment.

Response to Comment:
Subpart MMMM was moved to Permit Condition 6.

Comment # 3
Third, Permit Condition PW2 incorporates Special Conditions from Permit to Construct #042009-007, issued April 10, 2009. Permit Condition PW2 includes an emission limitation where the permittee shall emit less than 250.00 tons of VOC from the entire installation in any rolling 12-month period. This emission limitation, in the draft Part 70 operating permit, cites Special Condition 1 .a. as the origin and authority for inclusion in the operating permit. However, according to Permit to Construct #042009-07, Special Condition 1.a. also identifies the "entire installation," (for the purpose of this special condition) to include all emission units and processes "identified in

the DRS Emission Point Summary, dated April 24, 2007 and received by MoDNR as Attachment A of DRS Sustainment Systems Part 70 operating permit renewal application on May 1, 2007." Therefore, it appears the universe of emission units, comprising the "entire installation," at the time Permit to Construct #042009-007 was issued, involved a specific set of emission units and processes which have not been identified in this draft operating permit or in the DRS Application for Authority to Operate received by MoDNR September 29, 2014. EPA recommends MoDNR consider clearly delineating the "entire installation," as referenced in Special Condition 1.a. in Permit to Construct #042009-007, by including the Attachment A of DRS Sustainment Systems Part 70 Operating Permit renewal application of May 1, 2007, as a referenced attachment in this Part 70 operating permit.

Also, Permit to Construct #042009-007 includes a Special Condition 1.c. which requires DRS to use an Attachment B, in Permit to Construct #042009-007, to demonstrate compliance with Special Condition 1.a.; the emission limitation. MoDNR has not included Special Condition 1.c. as an applicable requirement in this draft operating permit. Therefore, EPA recommends MoDNR ensure that all construction permit applicable special conditions are appropriately included in the operating permit as required by 10 CSR 10-6.065(6)(C)1.

Response to Comment:
Plantwide conditions apply to all emission units at the entire facility. A statement to this effect was added to the preamble to Section 1. Additional authority was added through 10 CSR 10-6.020(2)(P)6. and 10 CSR 10-6.065(6)(C)1. Voluntary Limitation(s). The permittee agrees to the 250 tpy VOC limit for all emission points, current and future.

Permit to Construct #042009-007 Special Condition 1.c. also includes the option for "equivalent" forms approved by the Air Program. The permittee uses custom spreadsheets for emission tracking, which is covered by Attachment E.

Comment # 4
Fourth, Permit Condition 2 incorporates Special Conditions from Permit to Construct #012011-005, issued January 5, 2011. Permit Condition 2 includes an emission limitation where the permittee shall emit less than 40.0 tons of nitrogen oxides (NOx) combined in any rolling 12-month period, from emission unit EU-50. The emission limitation cites Special Condition 1.A. as the origin and authority for inclusion in this Part 70 operating permit. However, Permit to Construct #012011-005 includes a Special Condition 1.B. which requires DRS to use Attachment A, of Permit to Construct #012011-005, to demonstrate compliance with the emission limitation. MoDNR has not incorporated Special Condition 1.B., from Permit to Construct #012011-005, in this draft Part 70 operating permit. EPA recommends MoDNR ensure that all construction permit special conditions are appropriately incorporated into the Part 70 operating permit, in accordance with 10 CSR 10-6.065(6)(C)1.

Response to Comment:
Permit to Construct #012011-005 Special Condition 1.B. also includes the option for "equivalent" forms approved by the Air Program. The permittee uses custom spreadsheets for emission tracking, which is covered by Attachment E.

Comment # 5
Fifth, Permit Condition 3 incorporates special conditions from Permit to Construct #062016-003, issued February 5, 2016. Operational Limitation 1), in Permit Condition 3 says the emissions from the blasting enclosures shall be routed through the dust collector as stated in Special Condition 1. Permit Condition 3 does not have special conditions, so EPA suggests MoDNR consider revising this reference.
Additionally, Monitoring/ Record keeping requirement 1), in Permit Condition 3, requires the permittee to monitor and record the operating pressure drop across the dust collector at least once every 24 hours when in operation. It is MoDNR's customary practice to provide example compliance verification data collection records, in Part 70 operating permits, for public review and comment. However, there is no example record identified within Permit Condition 3 for review and comment. Therefore, EPA recommends MoDNR consider following their customary practice and include a referenced attachment to this DRS Part 70 operating permit, showing an approved compliance verification data collection record.

Response to Comment:
The reference to Special Condition 1 was removed. An example pressure drop worksheet was added as Attachment F.

Comment # 6
Sixth, Permit Condition 5 incorporates applicable requirements from 40 CFR part 60, Subpart IIII- *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.* The Reporting Requirement, in Permit Condition 5, requires the permittee to keep records of the hours of operation of the engines that are recorded through the non-resettable hour meter. It is MoDNR's customary practice to provide example compliance verification data collection records, in Part 70 operating permits, for public review and comment. However, there is no example record identified within Permit Condition 5 for review and comment. Therefore, EPA recommends MoDNR consider following their customary practice and include a referenced attachment to this DRS Part 70 operating permit, showing an approved compliance verification data collection record.

Response to Comment:
A worksheet to track generator non-emergency hours was added as Attachment G.

Comment # 7
Seventh, the Statement of Basis includes a Permit Reference Documents section which lists the documents relied upon in the preparation of the operating permit. However, the list in this draft Part 70 does not include Permit to Construct #0197-027, used as the origin and authority for Permit Condition 1; Permit to Construct #042009-007, used as the origin and authority for Permit Condition PW2; Permit to Construct #012011-005; used as the origin and authority for Permit Condition 2; and Permit to Construct #022016-003, used as the origin and authority for Permit Condition 3. The Statement of Basis also includes a section describing the Construction Permit History and here there is no mention of Permit to Construct #012011-005 and Permit to Construct #022016-003. EPA recommends MoDNR include all Permit Reference Documents used in the

development of this operating permit and provide the history for all construction permits issued to this installation.

Response to Comment:
Text was added to the Statement of Basis to address these comments.

Comment # 8
Finally, it appears that this installation has gone through several name changes and ownership over the past 30 years. EPA suggests MoDNR provide a brief ownership history, as part of the installation description, to assist in maintaining continuity with construction permits and operating permits.

Response to Comment:
A list of previous installation names was added to the Installation Description in the Statement of Basis.